



Blackman Uhler Specialties Company

Log # 10951

2007 SEP 28 AM 9:59
A Division of Synalloy Chemical Group
Post Office Box 5627, Spartanburg, South Carolina 29304-5627
2155 West Croft Circle, Spartanburg, South Carolina 29302
Phone (864) 585-3661 Fax (864) 596-1524

September 24, 2007

Technical Secretary
TDEC
Division of Air Pollution Control
9th Floor L&C Annex
401 Church Street
Nashville, TN 37243-1531

RE: Notice of Violation dated August 27, 2007

Dear Sirs:

This letter is in response to the Notice of Violation dated August 27, 2007, concerning noncompliance with TAPCR rule 1200-3-9-.01(1)(d) and Condition 8 of construction permit number 958324P.

As you are aware, Bristol Metals, LP submitted on June 17, 2005 a construction permit application for a paint booth in anticipation of a pending pipe coating project. A construction permit was issued by TDEC effective August 31, 2005, expiring March 1, 2006. The coating project was delayed, and consequently the installation of the paint booth was going to be delayed beyond the expiration date of the construction permit. A request to extend the construction permit was requested and granted by TDEC until November 1, 2006. The booth was installed in June, 2006 with some trial coating occurring July 7, 2006. The first order for coated pipe was begun August 16, 2006 and shipped August 21, 2006. The orders for coated pipe are intermittent and coating operations since August 2006, have been campaigned (i.e., ex. Coat for 2 weeks, no coating for 6-8 weeks, etc.).

The failure to apply for the operating permit within 30 days of the start of operations and certify the start-up date was an oversight. A change in management occurred during this time period at the positions of V.P. Manufacturing, Safety & Environmental Coordinator. The requirement was overlooked during the transition. The oversight was detected during an internal permit/records audit in late February, 2007. The operating permit request and the certification were submitted March 19, 2007 as a result of the audit findings.

Corrective Action: The corrective action for this failure is to continue internal permit and record compliance audits on a minimum annual basis.

We apologize for the oversight and inconvenience. Please feel free to contact me at 864-596-1590 should you have questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben O'Dell". The signature is stylized with a large, looped initial "B" and a cursive "O'Dell".

Ben O'Dell
Director, Safety & Environmental Affairs.
Responding for Bristol Metals, LP